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USDOC FOR 532/OEA/MNICKSON/ADYSON
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR PATRICK SANTILLO
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)

SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: WILSON LOGISTICS
LTD

REF: A) USDOC 00084 B)USDOC 00085

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

12. As per reftels A and B requests and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) conducted two post shipment-verifications (PSVs) at Wilson Logistics Ltd., Room 1002, 24-28 Kung Yip Street, Kwai Chung, Hong Kong (Wilson). The items in question for these PSVs are various electronic components exported to Wilson on or about August 11 and 15, 2008. On the applicable shippers export declaration (SED), these items are classified under export control classification number (ECCN) 3A001 and, if properly classified, would be controlled for national security (NS) reasons. The exporter was Luminento IC of Chatsworth, California.

13. According to the Hong Kong Companies Registry, Wilson has been in existence since 1988. Its paid up share capital is the Hong Kong equivalent of USD 12500. The Hong Kong Companies Registry lists three Hong Kong residents as directors, namely Cheung, Cho Yiu Rolon, Cheung, Ka Ying Apple and Cheung, Wing Fai.

14. A review of the company's web site (www.wilson-logistics.com) reveals that Wilson is a logistics services company in operation since 1988. It provides a range of services including warehousing, inventory management, order management and I.T.

15. On February 26, 2009, ECO accompanied by Commercial Assistant, Carrie Chan, visited Wilson and met with Colis Leung, Shipping Manager. She provided background on the company consistent with the information on the company's web site. She stated that the company typically accepts packages on behalf of mainland companies and helps arrange delivery of those packages to mainland clients. The company likewise helps its clients manage the export from China of finished products (often produced using inputs that flowed through Hong Kong to mainland production facilities).

16. Ms. Leung stated that, from time to time, Wilson obtains Hong Kong Strategic Trade licenses on behalf of its clients. Those cases typically involve situations in which a freight forwarder or the exporter informs Wilson that such a license is required. Based on a review of the applicable documentation, it is unlikely that U.S. export or reexport licenses were required for these shipments.

17. As to the shipments in question, Ms. Leung provided documentation verifying that the items had reached Wilson in Hong Kong and had been turned over to a transportation company named Anytime China Express Company Limited. According to Ms. Leung, this was the transport company appointed by the buyer of the items, namely Prime Technology (Guangzhou) Inc. Prime is a regular client of Wilson logistics and is listed as the buyer on the applicable transaction documentation provided by OEA. Web research reveals that Prime Technology is apparently an affiliate of the 3CEMS Group,

established in 1997. The group provides engineering and manufacturing services (it is a contract manufacturer) and is headquartered in Taiwan.

18. Based on the information noted above, ECO believes Wilson is a suitable recipient of U.S. origin technology, as logistics provider. ECO can make no determination as to the suitability of the apparent buyer (Prime Technology) or its appointed carrier.